

SEALED

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2021
JANUARY 25, 2022 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:22-cr-00016

18 U.S.C. § 1029(a)(2)

18 U.S.C. § 1341

18 U.S.C. § 1028A

18 U.S.C. § 1344(2)

LAURA DANIELLE JACKSON

I N D I C T M E N T

The Grand Jury charges:

Introduction

1. From approximately April 2018, through at least December 2020, at or near Milton, Cabell County, West Virginia, Hurricane, Putnam County, West Virginia, South Charleston, Kanawha County, West Virginia, St. Albans, Kanawha County, West Virginia, and Cross Lanes, Kanawha County, West Virginia, and within the Southern District of West Virginia, and elsewhere, defendant LAURA DANIELLE JACKSON, acting with intent to defraud, knowingly devised and attempted to devise schemes to defraud her employers, and others, to obtain money and property by means of false and fraudulent pretenses, representations, and promises through misuse and abuse of her employment positions.

Background

At all times material to this Indictment:

2. On or about January 8, 2018, defendant LAURA DANIELLE JACKSON, was hired by a privately held coal company ("Coal Company") that was located in Milton, Cabell County, West Virginia. Through her employment with Coal Company, defendant LAURA DANIELLE JACKSON had access to and permission to use a Coal Company credit card to make authorized business expenditures.

3. On or about September 4, 2018, defendant LAURA DANIELLE JACKSON, was hired by a privately held human resources company ("Temp Agency"), that was located in South Charleston, Kanawha County, West Virginia. Through her employment with Temp Agency, defendant LAURA DANIELLE JACKSON had access to the personal identification information of people who sought Temp Agency's assistance finding employment.

4. On or about October 16, 2018, defendant LAURA DANIELLE JACKSON, was hired by a privately held company engaged in the business of insurance ("Insurance Company") that was located in St. Albans, Kanawha County, West Virginia. Through her employment with Insurance Company, defendant LAURA DANIELLE JACKSON had access to the personal identification information of employees of Insurance Company.

5. On or about January 13, 2020, defendant LAURA DANIELLE JACKSON, was hired by a privately held company engaged in the business of public accounting and tax preparation ("Tax Firm") that was located in Cross Lanes, Kanawha County, West Virginia. Through her employment with Tax Firm, defendant LAURA DANIELLE JACKSON had access to financial information of clients of Tax Firm.

6. A bank known to the Grand Jury ("Victim Bank") was a financial institution as defined in 18 U.S.C. § 20 which had a branch at or near Cross Lanes, Kanawha County, West Virginia.

COUNT ONE

7. Paragraphs 1 and 2 are incorporated by reference herein.

8. From on or about April 2, 2018, and continuing to at least June 7, 2018, at or near Hurricane, Putnam County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant LAURA DANIELLE JACKSON did knowingly and with the intent to defraud, use an unauthorized access device belonging to Coal Company, that is a credit card, account number XXXX XXXX XXXX 9027, affecting interstate commerce, and by such conduct obtained things of value aggregating more than \$1,000 within a one-year period.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNTS TWO & THREE

9. Paragraphs 1 and 3 are incorporated by reference herein.

The Scheme

10. From on or about September 17, 2018, and continuing through at least November 13, 2018, at or near South Charleston, Kanawha County, and Hurricane, Putnam County, within the Southern District of West Virginia and elsewhere, defendant LAURA DANIELLE JACKSON did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means of the Scheme

11. It was part of the scheme that defendant LAURA DANIELLE JACKSON, used her position at Temp Agency to obtain the personal identification information of a person known to the Grand Jury ("B.L.").

12. It was further part of the scheme that after she obtained the name and other means of identification of B.L., defendant LAURA DANIELLE JACKSON applied for two separate credit cards by using the means of identification of B.L. At no time did B.L. give permission to defendant LAURA DANIELLE JACKSON to open credit cards by using his means of identification.

13. As part of the scheme, defendant LAURA DANIELLE JACKSON arranged for the credit cards to be mailed to an address in Hurricane, Putnam County, West Virginia.

14. In furtherance of the scheme, defendant LAURA DANIELLE JACKSON received, activated, and used the credit cards to buy goods, merchandise, and other items of value.

Use of the Mail

15. On or about the dates specified below, at or near, Hurricane, Putnam County West Virginia, within the Southern District of West Virginia and elsewhere, for the purpose of executing and attempting to execute the above described scheme and artifice to defraud, defendant LAURA DANIELLE JACKSON knowingly caused to be delivered by the United States Postal Service and by private and commercial interstate carrier, according to the directions thereon, the items described below, each mailing constituting a separate count:

<u>COUNT</u>	<u>APPROXIMATE DATE DELIVERED</u>	<u>ITEM DELIVERED</u>
2	September 22, 2018	An envelope containing Chase Freedom credit card account number XXXX XXXX XXXX 2565.
3	September 27, 2018	An envelope containing Visa credit card account number XXXX XXXX XXXX 5373

In violation of Title 18, United States Code, Section 1341.

COUNT FOUR

16. Paragraphs 1, 9 through 14 are incorporated by reference herein.

17. On or about September 22, 2018, at or near Hurricane, Putnam County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant LAURA DANIELLE JACKSON knowingly transferred, possessed, and used, without lawful authority, a means of identification of B.L. during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, Mail Fraud, knowing that the means of identification belonged to another actual person

In violation of Title 18, United States Code, Section 1028A.

COUNT FIVE

18. Paragraph 1 and 4 are incorporated by reference herein.

The Scheme

19. From on or about December 3, 2018, and continuing until at least February 5, 2019, at or near Hurricane, Putnam County, West Virginia, within the Southern District of West Virginia and elsewhere, defendant LAURA DANIELLE JACKSON did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means of the Scheme

20. It was part of the scheme that defendant LAURA DANIELLE JACKSON, used her position at Temp Agency to obtain the personal identification information of a person known to the Grand Jury ("J.L.").

21. It was further part of the scheme that after she obtained the name and other means of identification of J.L., defendant LAURA DANIELLE JACKSON applied for a credit card by using the means of identification of J.L. At no time did J.L. give permission to defendant LAURA DANIELLE JACKSON to open a credit card by using his means of identification.

22. It was further a part of the scheme that defendant LAURA DANIELLE JACKSON arranged for the credit card to be mailed to an address in Hurricane, Putnam County, West Virginia.

23. In furtherance of the scheme, defendant LAURA DANIELLE JACKSON received, activated, and used the credit card to buy goods, merchandise, and other items of value.

Use of the Mail

24. On or about December 5, 2018, at or near, Hurricane, Putnam County, West Virginia, and within the Southern District of West Virginia and elsewhere, for the purpose of executing and attempting to execute the above described scheme and artifice to defraud, defendant LAURA DANIELLE JACKSON knowingly caused to be delivered by the United States Postal Service and by private and commercial interstate carrier, according to the directions thereon, an envelope containing a Visa credit card account number XXXX XXXX XXXX 8517.

In violation of Title 18, United States Code, Section 1341.

COUNT SIX

25. Paragraphs 1, 18 through 23 are incorporated by reference herein.

26. On or about December 5, 2018, at or near Hurricane, Putnam County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant LAURA DANIELLE JACKSON knowingly transferred, possessed, and used, without lawful authority, a means of identification of J.L. during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, Mail Fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A.

COUNTS SEVEN through FOURTEEN

27. Paragraph 1, 5 and 6 are incorporated by reference herein.

The Bank Fraud Scheme

28. From on or about September 23, 2020, and continuing through at least November 17, 2020, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant LAURA DANIELLE JACKSON did knowingly execute and attempt to execute a scheme and artifice to defraud Victim Bank, and to obtain monies, funds, credits, assets, securities, and other property under the custody and control of Victim Bank, by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means of the Scheme

29. It was part of the scheme that defendant LAURA DANIELLE JACKSON used her position at Tax Firm to obtain checks that belonged to a church ("Church") located in Gassaway, Braxton County, West Virginia.

30. It was further part of the scheme that defendant LAURA DANIELLE JACKSON knowingly and without authorization wrote checks to herself from Church's checking account at Victim Bank.

31. It was further part of the scheme that defendant LAURA DANIELLE JACKSON cashed the fraudulently written checks at branches of Victim Bank. When defendant LAURA JACKSON cashed

these checks, she knew that she didn't have permission or authority to do so.

32. As part of the scheme, defendant LAURA DANIELLE JACKSON edited Church's internal accounting books to conceal the true recipient of the checks that she wrote to herself.

33. As a result of defendant LAURA DANIELLE JACKSON's fraudulent scheme, Victim Bank suffered a financial loss.

Specific Offense Conduct

34. On or about the dates below, for the purpose of executing and attempting to execute the scheme and artifice to obtain money owned by and under the custody and control of a financial institution, that is Victim Bank, by means of materially false and fraudulent pretenses, representations and promises, defendant LAURA DANIELLE JACKSON, knowingly presented to a financial institution the following fraudulent checks from Church's checking account at Victim Bank, each fraudulent check constituting a separate count:

<u>COUNT</u>	<u>APPROXIMATE DATE PRESENTED</u>	<u>LOCATION PRESENTED</u>	<u>BANK PRESENTED</u>	<u>CHECK NUMBER</u>	<u>DESCRIPTION OF CHECK</u>
7	9/3/2020	Cross Lanes, WV	Victim Bank	1833	\$300 check made payable to Laura Jackson.
8	9/8/2020	Cross Lanes, WV	Victim Bank	1835	\$400 check made payable to Laura Jackson.

9	10/2/2020	Cross Lanes, WV	Victim Bank	1840	\$400 check made payable to Laura Jackson.
10	10/6/2020	Cross Lanes, WV	Victim Bank	1854	\$400 check made payable to Laura Jackson.
11	10/13/2020	Cross Lanes, WV	Victim Bank	1856	\$600 check made payable to Laura Jackson.
12	11/1/2020	Cross Lanes, WV	Victim Bank	1871	\$1000 check made payable to Laura Jackson.
13	11/4/2020	Cross Lanes, WV	Victim Bank	1877	\$600 check made payable to Laura Jackson.
14	11/17/2020	Cross Lanes, WV	Victim Bank	1899	\$750 check made payable to Laura Jackson.

All in violation of Title 18, United States Code, Section
1344(2).

WILLIAMS S. THOMPSON
United States Attorney

By:



M. RYAN BLACKWELL
Assistant United States Attorney